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Abstract

In Denmark, the first law on Green Accounts was passed in July 1995. This law instructed a selected part of the Danish companies to prepare a Green Account containing general information about the company, a statement from the management and a quantitative account of the environmental performance. However, in 1999 the official evaluation of the law showed that the expectations to the Green Accounts were not fulfilled, and in 2002 the government strengthened the law. Among other new initiatives; the company should describe their environmental policy, goals and results - if any. In this paper the contents, effects and potentials of this new law will be discussed in relation to experiences with the first law, and a short overview of the general trends in environmental reporting will be given. This leads to some amendments of any future revision of the law – in consideration of both reaching a broader target group to expand the coverage of the reports, and to increase the communication value of the reports.

Environmental reporting: experiences from Denmark

By Tine Herreborg Jørgensen and Jette Egelund Holgaard

Reasons for environmental reporting

Stand alone corporate environmental reports were not released until the early 1990's when a small number of companies, including Monsanto from U.S.A and Hydro in Norway, issued reports on their emissions. Prior to these environmental reports they were mainly limited to estimates of environmental liabilities included as part of annual financial reports. [23]. The first examples of environmental reporting were characterised by direct response to political activism by NGO´s and community groups. During the past 10-15 years, regulatory requirements of environmental reporting have been implemented in an increasing number of countries. In the same period, generic voluntary approaches have been developed and implemented in various organisations.

There are several reasons why an increasing number of companies formulate and publish an environmental report. A dozen of examples from various sources are mentioned below:

Environmental reports can answer to demands (or an expectation of potential demands) from environmentalists, authorities, shareholders, employees or customers to report on specific environmental issues [23], [21].

Measures and reporting are necessary in order to drive environmental improvement in corporate environmental performance [23].

Several environmental management schemes either recommend or require environmental reporting, e.g. ICC Business Charter for Sustainable Development and EU's Environmental Management and Audit Scheme (EMAS). [23]

Environmental reports can serve to visualise an image of the company as having a moral obligation to account for its stakeholders [23], [21].

Environmental reports are one way to show an environmental effort which differentiate itself from other competitors or even start a benchmarking effect [23].

Environmental reports can inform individual investors, value investors and fund managers concerned with the corporate risk of companies [23].

Environmental reporting can serve to justify environmental investments and expenditures [23].

Reporting helps management to evaluate its environmental impact and prevent potential problems [6].

Reporting can be a key ingredient to build, sustain and continually refine stakeholders engagement [6], [23] and create a corporate image [21].

Transparency and open dialogue about performance, priorities, and future sustainability plans help to strengthen partnerships and to build trust [6].

Sustainability reporting can help sharpen management's ability to assess the organisation's contribution to natural, human and social capital [6].

The companies can place their environmental effort in a broader perspective by comparing their effort with an overall aim of sustainability. For instance, by comparing with national strategies for sustainable development, international conventions and recognised research [9].

In the early 1990's, the reasons for reporting in Europe had in fact nothing to do with the pressure from shareholders, customers or even campaign groups. In Europe, responsibility to the environment, public relations, competitive advance and legal compliance were the most frequently cited drivers for reporting [22]. In the European Union, Member States are required to register emission data from large companies (so called IPPC installations), and report this data to the commission. The emission data and sources responsible for the emissions will be publicly available in a European Pollutant Emission Register (EPER) [12]. However, some European nations go beyond that.

Implications of the first law on environmental reporting

Denmark was the first country to adopt legislation (amended in July 1995) on mandatory public environmental reporting [12]. The green account is to be commissioned from the Danish agency for Industry and Corporation, who approves the green accounts before they are publicised. The Environmental Protection Act (amended in July 1995) instructed that about 1,000 Danish companies were to produce environmental reports – the so-called Green Accounts. [17]. The basic demands in this law were an outline containing general information about the company, a statement from the management concerning the environment and a quantitative account presenting the environmental performances of the company, see figure 1.

The Green Accounts are the Danish authorities' way of expressing that the companies need to take responsibility for the environment. The ”hidden agenda” was to make the companies realise the advantage of a preventive environmental effort where the Green Account is the final documentation of a yearly progress. Secondly, the Green Account was also expected to give the private and public stakeholders a chance of assessing companies' environmental effort. Thirdly, the potentials of creating a benchmarking effect were considered.

General information	The name and address of the company The local environmental authority References to the list of companies having an environmental approval from the authorities and therefore are instructed also to prepare a Green Account Date of the latest environmental approval from the authorities Important information from the environmental approval given by the authorities Description of important primary activities Description of important secondary activities
Management statement	The reason for selecting the present content of the Green Account Important changes in relation to last years Green Account Information about the employee's participation in preparation of the Green Account Information about how employees have been involved, if this is the case Description of the working environment concerning polluting substances, etc. in the production processes to the extent it presents a risk for the employee's safety and health Where Green Accounts have been audited internally or externally by a special expert, the company may give information of such audit.
Environmental performance	Major consumption of energy, water and raw material Significant types and volumes of pollutants in the production processes Significant types and volumes of pollutants discharged to air, water and earth Significant types and volumes of pollutants in the company's products Significant types and volumes of pollutants in wastes from the company

Figure 1: Information prescribed by the law about green acounts.

In winter 1998, an investigation of 108 Green Accounts was carried out for The Danish magazine Ingeniøren (The Engineer) [8]. The investigation was based on the examination of Green Accounts from 6 selected industrial sectors including the founder industry, electronics, the textile industry, the graphic industry, the plastic industry and the food industry. This investigation showed that 25% of the Green Accounts were lacking statutory information, and the reader had no chance of assessing whether the missing information was important or not, because no reason was given. This indicated certain difficulties for some companies complying with the act.

But the investigation also showed that several companies in their first and second year of Green

Accounts had gone much further than required in the law. Over 20 percent of the reports contained a discussion of the companies' environmental policy, environmental actions plans and/or environmental achievements, and in few reports there was a discussion of employee participation and economic consequences of the environmental effort. And even though the primary focus of the reports was on resources and emissions, continuous improvements were discussed in 15% of the reports. However, the lifecycle perspective was only touched shortly in 7 % of the reports, and no company had mentioned the concept of sustainability.

Green Accounts can also be used in order to establish a dialogue with companies and other stakeholders, for example with customers, suppliers, local authorities and industry associations [17]. In 57% of the 108 Green Accounts, it was mentioned that the company had co-operated with stakeholders, but only 28% had described the content of the co-operation, and in these cases it was a superficial description in the superior policy.

Considering the communication value of the Green Accounts, not a lot of work had been put into setting the environmental performances in relation to a reference, in order for the reader to understand the figures. This excludes a benchmarking effect, where companies compare their environmental performance and enter into a friendly competition regarding the environmental performance. Furthermore, only 10% of the reports were characterised as good and detailed communication. Quantitatively, these companies gave a good overview of the activities and of the environmental performance. Assessments and perspectives were added to the numbers, and the Green Account contained environmental policies concerning both occupational health and safety, external environment, targets and action plans and included descriptions of improvement activities up to the present [17].

N=108	Not mentioned	Shortly mentioned	Discussed	Carefully discussed
Environmental policy	46%	27%	13%	14%
Environmental target / action plans	26%	53%	19%	2%
Environmental achievements	21%	58%	19%	2%
Employee participation	43%	43%	10%	4%
Economy	40%	54%	6%	0%
Resources and emissions	0%	-	100%	-
Continuously improvements	57%	28%	10%	5%
Lifecycle perspective	93%	7%	0%	0%
Sustainable development	100%	0%	0%	0%

Figure 2: Results from the 1999 evaluation of 108 green accounts [17].

In 1999 the same conclusions were indicated in an official evaluation of the act by an investigation of 550 Green Accounts conducted by the Danish Centre for Alternative Society Analysis at the request of The Danish Environmental Protection Agency. The public did not order and read the Green Accounts, and had very little confidence in the information given which was another interesting result. However, the reporting process often resulted in employee participation and higher ambitions in the environmental effort. From the official evaluation, the following conclusions can be summarised [17]:

The firms have experienced a very small interest in the Green Accounts. Half of all firms have sent out less than 10 Green Accounts, and 3 out of 4 have obtained no reactions to their accounts.

The public, for example neighbours and consumers, finds only little confidence in the Green Accounts content.

40% of the companies have achieved environmental improvements.

50% of the companies have involved employees in preparing the Green Account, and 60% of these companies have experienced a positive effect of this.

For several companies, working with Green Accounts has also contributed to the establishment of new environmental policies, setting up environmental action plans or introduction of environmental management.

Considering these conclusions, it seems that the companies have used the Green Accounts as a tool in their environmental effort – at least in half of the cases. But not as a tool in communicating the companies' environmental performance to the public, as it was intended in the law.

In line with this, a more in-depth investigation of 20 Green Accounts in 2001 indicated that the environmental management discourse was reflected in most reports, see [7]. From 1999-2001 there was a trend towards a broader content of the reports, however, the form of the environmental reports could be considerable improved in most cases. Most companies were describing the environmental effort of the company, but not much explanation was given – e.g. by informing of environmental improvements or visualising the progress in the environmental effort.

Making follow-up interviews with the environmental co-ordinators in 8 of the companies showed that some of the companies considered the environmental account as an important tool in the internal management of the environmental effort, which supported the results from the official evaluation. This indicated that there was a motivating factor of improving the environmental reports which the debate about environmental reports in Denmark had paid less intention to.

Furthermore, the problem with some reports lacking statutory information was still present, and the companies were still lacking feedback from other parties on the environmental reports. However, some of the companies had experienced an increasing demand for environmental information from their customers. So even though the reach of environmental reports was still very limited as regards the public – the one way communication to the authorities seem to be broadened with few examples of internal and external communication in the company and in supply-demand relations. In sum, the main experiences of the first law on environmental management were:

Difficulties complying with the act, as 20-25% of the Green Accounts were lacking statutory information, but still the authorities approved them.

The public at large was not using the Green Accounts and felt a lack of confidence to the content. As a consequence, the demand for the environmental report was very low.

Environmental reports showed strengths in accordance to internal environmental management systems and external demands for environmental information.

Some of the companies tended to go beyond regulation, setting the agenda for future regulation initiatives. They did it mainly by increasing the coverage of the report, whereas many of the small and mediumsized companies did not seem to prioritise the communication value of the report.

Before the presentation of the revised law on Green Accounts in 2002, the new tendencies in environmental reporting are discussed.

New tendencies in environmental reporting

If we turn to the front-runner companies of environmental reporting, the general tendency throughout the 1990's showed that environmental reporting evolved in two directions, as the reports became more detailed and quantified, and at the same time the coverage of the reports expanded [23]. The increased details and quantification is, to a certain extent, due to an implication of the pressure from the authorities, as many of the laws lain down by the authorities demand for this kind of information. In return, the expansion of coverage seems to be caused by stakeholder-pressure in order to broaden the picture to social responsibility and make the linkages to financial data more clear.

A shift from shareholder to stakeholder information, and from selective accounting to a more holistic accounting has been conspicuous in the conceptual development of environmental reporting (see for example [1] or [3]. This has caused the concept of environmental reporting to differentiate itself from traditional management accounting in considering the impact from companies activities to the external environment and expanding the view on the environmental impact by relations to social and financial considerations.

During the 1990's, about five years behind the practice of environmental auditing and reporting, the art of social reporting began to gather advocates and practitioners, focusing on measuring the quality of stakeholder relationships and social performance of co-operations. The concept was inspired by the thoughts in the concept of sustainable development, corporate social responsibility and stakeholder inclusion. By the end of the decade, social reporting became institutionalised. Among the corporate social responsibility initiatives around the world in recent years, some of them have achieved a high degree of recognition. They have all developed by social partnership involving some elements of business, governments, labour organisations and NGO's.

They are voluntary initiatives and do not address issues of regulation, even though many derive some of their legitimacy by reference to international conventions and regulations [13: p98].

In Denmark, it is possible to obtain a certification of a company's social responsibility by means of the Social Index (or SA 8000). The Social Index was developed and launched in 2000 by the Danish Ministry of Social Affairs, and was further developed to a third version in august 2003. Contemporary, it belongs to the Danish Ministry for Employment. The Social Index is a tool to implement social responsibility in the companies, and can be used in different ways [14]:

As a basis for formulating social objectives and means and thus increase the company's social efforts and responsibility.

As a tool for comparison: if the process is repeated, the company's effort can be measured over time. If an impartial audit team has controlled the company, the efforts can be compared with the results of other companies.

For cultivating company image: as the company can get The Social Index certified, this is the way to prove to the surrounding world that the company meets the expectations.

The Social Index is a tool for both public and private companies. By use of dialogue between employees and management the Social Index takes the company through the various aspects of social responsibility. This gives the company an overview of its social efforts and results, and furthermore, the company gets the opportunity to discuss good points and areas for improvement. The Social Index contains a number of statements concerning social responsibility. For example, to what extent does the company has a social partnership with the municipality in order to make room for people outside the labour market whom do not have their full working ability. They also have to make suggestions on how the company can improve its performance.

The result is shown as a number of points between 0 and 100. A company with at least 60 points out of 100 points can become certified, and obtain the right to use a logo symbolising social responsibility. The logo can be used in company reports, on commodities and so forth (Navigent, 2004). The company may use The Social Index to communicate its social responsibility efforts to the surrounding society. For example, towards customers, suppliers, investors, the community, new employees and so forth. Yet only four companies are certified. The minister of employment would like to find ways to reward companies working serious with Social reporting and increase the incentives to become certified [2].

Furthermore, in the late 1990's, there has been an increasing focus on combining environmental and economic issues. The concept of Environmental Management Accounting (EMA) represents an approach which provides for the transition of data for financial accounting (information needs of external shareholders), cost accounting (for internal management) and mass balance (input-output analysis) [10] – see [19] & [20] for further information. The purpose is to increase material efficiency, reduce environmental impacts and risks and reduce costs of environmental protection. EMA's starting point is that environmental costs are not fully recorded, and this often lead to distorted calculations for improvements options and achieved savings, e.g. waste is expensive but not only because of disposal fees but also because of the wasted materials purchased. The hidden environmental economy is often a bigger expense than expected, and this means that the savings are bigger when environmental impacts are reduced. [18].

The Expert Working Group on “Improving the Role of Government in the Promotion of Environmental Management accounting" was set up in 1998 by the United Nation's Division for Sustainable development (UN DSD) in co-operation with a number of government agencies and non-governmental experts. The aim was to promote EMA through publications, pilot projects and by establishing an international forum of discussion on the role of governments in the promotion of EMA. [10]. In Denmark, the project “Tools to the economic decision process” supported by DEPA, and initiated in the fall 2002 seeks to present the concept of EMA for nine case companies [4] – all having an environmental management system as a platform [16].

In general, several tools have been developed in order to support the companies in making environmental reports, not only related to social responsibility and EMA, but also from a more holistic perspective. E.g., methods presented by the Global Reporting Initiative (GRI) are prescribing guidelines for increasing the communication value and is setting up recommended indicators for sustainability regarding both financial, environmental and social issues. GRI includes the Coalition for Environmental Responsible Economics (CERES), the United Nations Environmental Pro-

The GRI-principles for company reporting of environmental, social and ethical information can be summarised as follows:

Transparency: Full disclosure of the processes, procedures and assumptions in report preparation are essential to its credibility.
Inclusiveness: The reporting organisation should engage its stakeholders in preparing and enhancing the quality of reports.
Accountability: Reported information should be recorded, compiled, analysed and disclosed in a way that enables internal auditors or external assurance providers to attest to its reliability
Completeness: All material information should appear in the report.
Relevance: Reporting organisations should use the degree of importance that report users assign to particular information in determining report content.
Sustainability Context: Reporting organisations should seek to place their performance in the broader context of ecological, social or other issues where such context adds significant meaning to the reported information.
Accuracy: Reports should achieve a degree of exactness and low margin of error to enable users to make decisions with a high degree of confidence.
Neutrality: Reports should avoid bias in selection and presentation of information and provide a balanced account of performance.
Comparability: Reports should be framed so as to facilitate comparison to earlier reports as well as to reports of comparable organisations.
Clarity: Information should be presented in at manner that is understandable by a maximum number of users while still maintaining a suitable level of detail.
Timeliness: Reports should provide information on a regular schedule that meets user needs and comports with the nature of the information itself.

Figure 3: The GRI reporting principles [6].

gramme (UNEP), the World Business Council for Sustainable Development (WBCSD, and the UK Association of Chartered Certified Accountants (ACCA) [12].
The guidelines were released in a draft form in March 1999, were revised and re-released in June 2000 after a period of extensive pilot testing. In developing the guidelines, there were inputs from more than 50 countries [11]. Another revision of the guideline was made up to 2002 [6]. See figure 3.

Besides showing the trend of a more holistic and detailed reporting practise together with a considerable stakeholder focus, the guidelines also show the trend towards more focus on the communication value by setting up principles for "good reporting practise". Together with the experiences of the first law on environmental reporting in Denmark (see section 2), these trends are reflected in the revision of the act on environmental reporting in Denmark, 2002.

Discussion of the revised Danish law on green accounts from 2002

In August 2002, the Statutory Order of environmental accounting from 1995 was revised. The new edition introduced new demands and new forms of administration, and can be seen as an extension of the act from 1995. The most essential new requirements in the revised statutory order from 2002 can be summarised as follows [5]:

Information about developments in the environmental situation of the company in the latest five financial years.

Information about waste generation and management of the company.

Future-oriented information about environmental policy and objectives of the enterprise, and information on concrete results achieved, including the fields of energy, transport and waste.

Information about staff involvement in environmental activities.

Information about environmental requirements for suppliers.

Information about corrective action on non-compliance with conditions of approvals, and prevention of recurrence.

Information about essential complaints.

Summary of self-assessment at the company.

The information must be well-arranged and designed for the non-professional reader.

The supervisory authority must make a statement on the accounts.

Companies with a need for a legal environmental approval, and with more that 20 employees have to draw up Green Accounts – and the same goes for all IPPC companies.

As a result of the previous analysis of the experiences of the first law on environmental accounts in Denmark, and the general trends in environmental reporting, the following hypotheses could be expected in relation to the revised Danish act on environmental reporting:

The demands of the law are strengthened, as evaluations show that 20-25% of the Green Accounts are lacking statutory information, and the public does not have confidence in the content of the environmental reports.

The act tries to motivate the use of environmental reports in internal management, as investigations show that some companies have considered environmental reports as an effective tool in the internal management – which could be a motivation to increase the quality of the reports.

The act tries to motivate a move from shareholder to stakeholder information, as the general international trend for environmental reporting shows that the coverage of the reports are expanded to account for externalities in relation to the companies stakeholders.

The act initiates a more detailed and quantified information, as this has been a general trend in environmental reporting, and this could increase the confidence of environmental reports for some stakeholders.

A move from selective to holistic accounting is motivated, as this is a general trend in environmental reporting, e.g. by making links between environmental, economic and social considerations.

More focus on communication value, as this could increase the reach to the public, and furthermore tools have been developed as the GRI-principles in order to increase the communication value.

In the following, these hypotheses will be shortly discussed in relation to the new law.

The demands of the law are strengthened

An important purpose of revising the Statutory Order on Green Accounts from 1995 was to strengthen the dialogue between supervisory authorities and companies [5]. At the same time, the demands in the law are strengthen by requesting a statement from the supervisory authorities. Together with the fact that companies, which have under 20 employees, are excepted from the duty to draw up Green Accounts, this should result in considerably fewer reports with lacking statutory information – in contradiction more demands to the coverage of the reports can draw in the other direction. Furthermore, the statement from the supervisory authorities may affect the confidence of the report to the public at large.

However, it can be questioned whether the preconditions for this kind of demands in the law are, in fact, in place. The supervisory authorities have not gained any specific resources to fulfil this new requirement, which may limit the preparation for making the statements and the time for dialogue between the supervisory authorities and enterprises in means of increasing the quality of the reports and environmental protection in general.

Motivating the use of environmental reports in internal management

There are, in fact, changes in the law, trying to initiate activities for internal use in environmental management. First, the future-orientated information on environmental policy and objectives of the enterprise can stimulate a higher systematisation of the environmental management process in the company. Secondly, the information of staff-involvement in the environmental work also require the company to assess, whether the employees are in fact involved in, or only informed about, the environmental effort of the company. Thirdly, information about the company's waste-management and a summary of the self-assessment at the company are required.

Even though that the new demands mentioned above are considerable improvements compared to the first law on environmental accounting, more focus still seems to be on documenting results, in stead of trying to explain the process of pollution prevention and continuous improvements.

From shareholder to stakeholder information

One of the changes in moving from a shareholder to a stakeholder focus is the increased attention to externalities, which is the way the company effects the external environment. At least, the act shows a broader coverage in relation to a life cycle perspective by including results of transportation and waste activities – if any. Changes, trying to initiate more stakeholder dialog, are also present by asking for information of essential complaints from neighbours and any environmental requirements for suppliers.

Nevertheless, an actual productorientated information to the customers is not expected, probably due to the high degree of small and mediumsized companies with lack of resources to prepare this kind of information. But if the Green Accounts included some kind of information about the environmental performance of the products, then purchasers from both private and public institutions would be more motivated to ask for the Green Account. An alternative to the present information could be rather quantitative perspective on life-cycle information so that the companies were motivated to describe any or potential collaboration with external partners in regard to decrease the environmental impact from the companies' processes and products.

More focus on detailed and quantified information

The new act does not take considerable steps towards more detailed or quantified information – however, this trend was already dominating the platform of the old law, on which the new law is build. This law highly focuses on quantified information on the company's input and output. On the contrary, one could say that the new law tries to make focus on detailed and quantified information less dominating, e.g. by asking for future-orientated information and staff involvement in the environmental management of the company. In our opinion, this is the key to create a more interesting and informative Green Account, by which many doors could be opened to reach the public at large, but also to gain interest from other companies in the connected product chains.

A move from selective to holistic accounting is motivated

The new act does not show considerable trends towards a more holistic accounting, as it only accounts for the company's environmental effort and impact. However, in the guidelines prepared to support the companies complying to the law on Green Accounts, it is mentioned as inspiration to other possible themes and information which goes beyond the law [5]. A few large Danish companies, e.g. Grundfos, Brd. Hartmann and Novo Nordisk take a front-position in creating holistic accounts – or at least a row of separate accounts, including both social, environmental and economic activities and results.

Nevertheless, it seems to have long term perspectives to get the primary part of small and medium sized companies to go that far in environmental reporting. In that way, one could say that the law is appropriate to the time and place of practise. However, if a more qualitative perspective is lain down on the law, these SMEs could actually describe any activities to improve the social conditions at the company or at the suppliers. In the same way, an estimation of money saved by reductions in the use of resources or an assessment of the long-term advantages of the company's environmental activities could be motivating for an increased environmental effort at the company and its stakeholders.

More focus on communication value

An important purpose of revising the Statutory Order on Green Accounts from 1995 was to strengthen the value of Green Accounts to the public [5]. This to answer for the results of evaluations of the reporting practise, showing that the public did not use the Green Accounts as intended.

In the revised law, it is pointed out that the information must be well-arranged and designed for the non-professional reader. The reader must be informed whether:

The given data is measured, calculated or estimated,

The results of the environmental performance are given in indexes or in absolute numbers,

There have been changes in measuring or calculation methods from last years account,

The Green Account has been examined by an external verifier, and in that case the name and declaration of that party.

The changes in the Statutory Order on environmental accounting demand for a well-arranged report designed for the non-professional reader. This calls for a higher attention to the principles of good environmental reporting, e.g. transparency, completeness and accuracy (see the GRI principles in figure 2) – however, it is up to the company to decide, how this challenge could be met. Furthermore, the focus is still on presenting environmental results and not processes. A more process-oriented view could end up in more "down-to-earth" stories told, e.g. the implementation of cleaner technology. In our opinion, such stories would be an important link to reach the non-professional reader.

Conclusion

In the Danish case, the regulative institutions have had considerable importance for the development in the practise of Environmental reporting among companies, both in relation to the concrete content and form of the reports but also in securing that environmental reporting is not only an activity reserved for large corporations. The international trend on the conceptual level has also had an importance, both to the revision of the law on Green Accounts and to the voluntary reporting practise of companies in Denmark.

An important intention with the revised law on Green Accounts is to increase the motivation of companies to make the environmental reports. First, by motivating the use of environmental reports in internal management by asking for future-orientated information, e.g. on environmental policy. Secondly, by motivating a broader coverage and reach of the report touching upon potential product-orientated results, essential complaints from neighbours and any environmental requirements from suppliers. However, the law is not reaching for more links to social and economic considerations in order to put the environmental information in a broader context. The link to social reporting could be strengthened, if the companies were obliged to consider the social index in their Green Accounts.

The recommendation to any revision of the law is therefore not to increase the coverage in terms of quantified measures. Instead, we notice a lot of potentials in asking for more qualitative information, telling story-lines about the processes of environmental management, and pollution prevention in the company. So far, the financial discourse of accounting asking for quantified measures have been dominating – but this is not sufficient when the target group is the stakeholders at large and not the shareholders in specific.

The motivation and interest from stakeholders can only be created, if the Green Accounts are connected to the pollution prevention activities in the companies and to a high communication value. Two numbers are simply not enough to convince the reader of environmental responsibility – without concrete examples given of environmental activities, organisations and perspectives. Further motivation can be given by making a collegial competition in the industrial sector about best possible environmental performance, e.g. hosted by the authorities. Though benchmarking of Green Accounts might require more uniform standards for the quantitative data to make a comparison possible. Another motivation for the stakeholders could be information on the environmental impacts from the products and the preventive activities in that concern, and last but not least by linking the environmental information to social and economic aspects. A campaign to make the stakeholders aware of the existence of, and the free assess to, the Green Accounts could also be carried out by ministers, homepages of ministries and other media.

However, there is no point in increasing the demands if they are not enforced. Experiences have shown that rather many green accounts are published through the Commerce and Companies agency, even though some of the required information is missing. And as the companies tend to show the same information pattern every year, accepting an insufficient Green Account once, means that the company will continue its ”bad habit”. A revised act is one way of getting rid of these "bad habits", and in the new law, initiatives have been made to strengthen the maintenance of the law by asking for a statement from the supervisory authority. But as no extra resources are given to make those statements, the effect can be questioned.

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